

1 THE HONORABLE JOHN C. COUGHENOUR
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7 UNITED STATES DISTRICT COURT
 8 WESTERN DISTRICT OF WASHINGTON
 9 AT SEATTLE

10 BEAR MARTINSON and MEGAN)
 11 MARTINSON, husband and wife and the)
 12 marital community comprised thereof,)
 13 Plaintiffs,)
 14 v.)
 15 PROGRESSIVE CASUALTY INSURANCE)
 16 COMPANY, a foreign insurance company)
 17 Defendant.)
 _____)

No. 2:24-cv-01345-JCC
 STIPULATION AND [PROPOSED]
 ORDER FOR DISMISSAL WITH
 PREJUDICE OF DEFENDANT
 PROGRESSIVE CASUALTY
 INSURANCE COMPANY

18 I. **STIPULATION**

19 IT IS HEREBY STIPULATED by and between the parties hereto that any and all claims
 20 and causes of action against defendant Progressive Casualty Insurance Company may be
 dismissed with prejudice and without an award of costs or fees to any party.

21 DATED: December 16, 2024.
 22

23 *Attorneys for Plaintiffs:*

24 **LAW OFFICES OF SAM ELDER PLLC**

25
 26 By: *s/Samuel J. Elder via email authority*
 27 Samuel J. Elder, Jr., WSBA No. 26085

*Attorneys for Defendant Progressive
 Casualty Insurance Company:*

JENSEN MORSE BAKER PLLC

By: *s/Steven D. Jensen*
 Steven D. Jensen, WSBA No. 26495
 William Christopher Gibson, WSBA

28 STIPULATION AND [PROPOSED] ORDER FOR
 29 DISMISSAL WITH PREJUDICE - 1
 Case No. 2:24-cv-01345-JCC

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STIPULATION AND [PROPOSED] ORDER FOR
DISMISSAL WITH PREJUDICE - 2
Case No. 2:24-cv-01345-JCC

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PHONE: 206.682.1550

1 II. **[PROPOSED] ORDER**

2 Pursuant to the Stipulation above, it is hereby ORDERED that any and all claims and
 3 causes of action against defendant Progressive Casualty Insurance Company are dismissed with
 4 prejudice and without an award of costs or fees to any party.

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7 DATED: December 17, 2024

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10 JOHN C. COUGHENOUR
11 United States District Court Judge12
13 Presented by:14 ***Attorneys for Plaintiffs:***15 **LAW OFFICES OF SAM ELDER PLLC**

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CERTIFICATE OF SERVICE

Pursuant to RCW 9A.72.085, the undersigned certifies, under penalty of perjury under the laws of the United States of America and the State of Washington, that on the 16th day of December, 2024, the document attached hereto was delivered to the below counsel in the manner indicated.

Counsel for Plaintiffs

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- Via CM/ECF
- Via electronic mail
- Via U.S. Mail, postage prepaid
- Via Facsimile
- Via Courier
- Via Overnight delivery

DATED this 16th day of December, 2024, in Kansas City, MO.

By Gwendolyn M. Wall
Gwendolyn M. Wall, paralegal